



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:  
SR- 6J

March 4, 2015

Mr. Chase Fortenberry  
Georgia-Pacific LLC  
133 Peachtree Street NE  
Atlanta, GA 30303

RE: Draft Area-Wide Non-PCB Constituent Screening Evaluation Approval

Dear Mr. Fortenberry:

The U.S. Environmental Protection Agency (EPA) has completed its review of the revised Area-Wide Non-PCB Constituent Screening Evaluation, submitted on January 30, 2015, for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. The purpose of the screening is to identify non-PCB constituents that may be considered constituents of interest for Operable Unit 5.

Georgia-Pacific has adequately addressed EPA's previous comments. However, EPA does have a few minor comments on the document. Therefore, EPA approves the non-PCB constituent screening evaluation pending incorporation of the enclosed comments into a final report. The final report is due (30) thirty days after receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. Saric", is positioned above the typed name of the sender.

James A. Saric  
Remedial Project Manager  
SFD Remedial Response Branch #1

Enclosure

cc: Paul Bucholtz, MDNRE  
Garry Griffith, Georgia-Pacific  
Richard Gay, Weyerhaeuser  
Jamie McCarthy, KRWC

## US EPA COMMENTS ON THE REVISED AREA-WIDE NON-PCB CONSTITUENT SCREENING EVALUATION

### GENERAL COMMENTS

Commenting Organization: USEPA  
General Comment #: 1

Commenter: Keiser

In general the supporting statements and conclusions developed within the document should be clarified and strengthened. See the specific comments below.

### SPECIFIC COMMENTS

Commenting Organization: USEPA  
Section: 2  
Specific Comment #: 1  
Page #: 2-4

Commenter: Keiser  
Lines #: NA

Last sentence section 2.2.2.1, this statement could be stronger, the concentrations appear to be the result of sampling and laboratory artifacts.

Commenting Organization: USEPA  
Section: 2.2.3  
Specific Comment #: 2  
Page #: 2-7

Commenter: Keiser  
Lines #: NA

Modify the last line, "... qualified as secondary because the UCL and mean used to calculate the HQs have a higher degree of uncertainty, given the biased sampling design and the conservative Tier 2 screening criteria used."

Commenting Organization: USEPA  
Section: 2  
Specific Comment #: 3  
Page #: 2-18, 3<sup>rd</sup> bullet

Commenter: Keiser  
Lines #: NA

Second sentence "...and some samples were filtered to focus on the finer-grained particles in the sample" Clarify, fine grained soil intervals were preferentially selected for analysis from the individual cores rather than course grained intervals?

Commenting Organization: USEPA  
Section: 2.4.1  
Specific Comment #: 4  
Page #: 2-19

Commenter: Keiser  
Lines #: NA

"2, 4 Dimethylphenol and pentachlorophenol were detected in 1 of 59 and 3 of 59 paper residual samples, respectively. This discussion should be moved to Section 2.4.2 Uncertainties with Excluding Constituents with a Low Frequency of Detection"

Commenting Organization: USEPA

Section: 3.2.3

Page #: 3-7

Commenter: Keiser

Lines #: NA

Specific Comment #: 5

Middle of the paragraph "A HQ greater than 1 does not indicate that adverse impacts will occur..." Insert does not necessarily indicate..."